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8 IN THE UNITED STATES DISTRICT COURT  
9 EASTERN DISTRICT OF CALIFORNIA  
10

11 UNITED STATES OF AMERICA,

12 Plaintiff,

13 v.

14 APPROXIMATELY \$16,550.00 IN  
U.S. CURRENCY, AND

15 APPROXIMATELY \$7,000.00 IN  
16 U.S. CURRENCY,

17 Defendants.  
18

CASE NO. 2:23-MC-00036-MCE-CKD

STIPULATION AND ORDER EXTENDING TIME  
FOR FILING A COMPLAINT FOR FORFEITURE  
AND/OR TO OBTAIN AN INDICTMENT  
ALLEGING FORFEITURE

19 It is hereby stipulated by and between the United States of America and potential claimant Joshua  
20 William Redford (“claimant”), by and through their respective counsel, as follows:

21 1. On or about October 25, 2022, claimant filed a claim in the administrative forfeiture  
22 proceeding with the U.S. Postal Inspection Service with respect to the Approximately \$16,550.00 in U.S.  
23 Currency and Approximately \$7,000.00 in U.S. Currency (hereafter “defendant currency”), which were  
24 seized on August 5, 2022.

25 2. The U.S. Postal Inspection Service has sent the written notice of intent to forfeit required  
26 by 18 U.S.C. § 983(a)(1)(A) to all known interested parties. The time has expired for any person to file a  
27 claim to the defendant currency under 18 U.S.C. § 983(a)(2)(A)-(E), and no person other than claimant  
28 has filed a claim to the defendant currency as required by law in the administrative forfeiture proceeding.

3. Under 18 U.S.C. § 983(a)(3)(A), the United States is required to file a complaint for forfeiture against the defendant currency and/or to obtain an indictment alleging that the defendant currency is subject to forfeiture within ninety days after a claim has been filed in the administrative forfeiture proceeding, unless the court extends the deadline for good cause shown or by agreement of the parties. That deadline was January 23, 2023.

4. By Stipulation and Order filed on January 25, 2023, the parties stipulated to extend to February 22, 2023, the time in which the United States is required to file a civil complaint for forfeiture against the defendant currency and/or to obtain an indictment alleging that the defendant currency is subject to forfeiture.

5. As provided in 18 U.S.C. § 983(a)(3)(A), the parties wish by agreement to further extend to March 24, 2023, the time in which the United States is required to file a civil complaint for forfeiture against the defendant currency and/or to obtain an indictment alleging that the defendant currency is subject to forfeiture.

6. Accordingly, the parties agree that the deadline by which the United States shall be required to file a complaint for forfeiture against the defendant currency and/or to obtain an indictment alleging that the defendant currency is subject to forfeiture shall be extended to March 24, 2023.

Dated: 2/22/2023

PHILLIP A. TALBERT  
United States Attorney


By: /s/ Kevin C. Khasigian  
KEVIN C. KHASIGIAN  
Assistant U.S. Attorney

Dated: 2/21/2023

/s/ Daniel M. Smith  
Daniel M. Smith  
Attorney for potential claimant  
Joshua Redford  
(Signature authorized by email)

**IT IS SO ORDERED.**

Dated: February 23, 2023

  
MORRISON C. ENGLAND, JR.  
SENIOR UNITED STATES DISTRICT JUDGE

Stipulation and Order to Extend Time